

## **REMARKS**

The Office Action mailed on November 4, 2004, has been carefully reviewed and the foregoing amendments and following remarks are offered in response thereto. Applicants respectfully request favorable reconsideration of this application, as amended.

Figures 1 and 2 have been amended to add descriptive text labels to the unlabeled rectangular boxes in response to the Examiner's objection. Claims 18 and 20 have been canceled without prejudice or disclaimer to the underlying subject matter. Without acceding to the rejections under § 103, Claims 23, 24, 27 and 28 have been amended to more clearly recite certain distinctive features of the claimed invention. Thus, claims 14–17, 19 and 21–28 are pending.

CompuServe (PCT International Application Publication WO 97/18516), which is the basis for the § 103 rejection, discloses a method for translating World Wide Web pages, i.e., hypertext documents written in a "markup language" (e.g., HTML). CompuServe teaches that an HTML document is: (1) pre-processed to place boundary markers around HTML codes that are to be preserved during translation, (2) translated from the original language to the target language, and (3) post-processed to remove the boundary markers, thereby protecting the HTML codes from translation into the target language. Figure 2 depicts these boundary markers as the "{" and "}" character pair, for example. *See, e.g., Pages 3–4; Page 6, lines 1–10; FIG. 2, etc.*

CompuServe fails to teach or suggest retrieving localization information associated with a localization tag and replacing the localization tag in the markup document with a localized value found in a translation file (Claims 14 and 23). CompuServe also fails to teach or suggest a localization tool which localizes the markup document stored in the first storage unit by replacing the localization tags with localized values found in the translation file stored in the second storage unit (Claim 24). Furthermore, CompuServe fails to teach or suggest associating at least one localization attribute with a tag to be internationalized, proposing entry of at least one value corresponding to a target language of the markup document being edited and creating the markup document and an associated translation file (Claim 27). Moreover, CompuServe fails to teach or suggest an editor for editing a markup document having localization tags and associated localization information and for creating a reference file and an associated translation file based on information entered by a user, the translation file including localization values which replace respective localization tags (Claim 28).

Instead, CompuServe discloses boundary markers that are placed around HTML tags, by preprocessing software, to indicate to translation software that these HTML tags are not replaced. CompuServe's post-processing software then removes the boundary markers from around the HTML tags, leaving the original HTML tags undisturbed. CompuServe thus protects HTML tags from translation and simply fails to teach or suggest the concept of replacing localization tags with localized values, as recited by the claims.

Claims 14, 23, 24, 27 and 28 thus clearly distinguish patentably from CompuServe as has been explained above. Moreover, none of the remaining references, taken either singly or in combination, is seen to teach or suggest the aforementioned features of Claims 14, 23, 24, 27 and 28.

In view of the amendments presented herein, and the reasons explained in the preceding remarks, Applicants submit that this application is in condition for allowance and should now be passed to issue.

A Notice of Allowance is respectfully solicited.

If any extension of time is required in connection with the filing of this paper and has not been requested separately, such extension is hereby requested.

The Commissioner is hereby authorized to charge any fees and to credit any overpayments that may be required by this paper under 37 C.F.R. §§ 1.16 and 1.17 to Deposit Account No. 50-1165.

Respectfully submitted,

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**AMENDMENTS TO THE DRAWINGS**

Please replace originally-filed FIGS. 1 and 2 with replacement FIGS. 1 and 2 on the two (2) Replacement Sheets submitted herewith.